

**From:** [ANDERSON Jim M](#)  
**To:** [Kristine Koch/R10/USEPA/US@EPA](#); [Sean Sheldrake/R10/USEPA/US@EPA](#); [Chip Humphrey/R10/USEPA/US@EPA](#); [Eric Blischke/R10/USEPA/US@EPA](#)  
**Cc:** [MCCLINCY Matt](#); [ROICK Tom](#)  
**Subject:** FW: RPAC Source Control Letter  
**Date:** 08/20/2007 03:40 PM  
**Attachments:** [8\\_07 EPA SC Letter to RPAC.doc](#)  
[Rhone Poulenc 8 2007.pdf](#)

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Kristine,

Thanks for revising EPA's draft letter. I really appreciate the thought & work you put into it, & your spirit of cooperation & compromise. I think we're very close to agreeing what the message should be. I also continue to think that it's imperative DEQ & EPA agree on the message in the letter. I copied your revised letter from a .pdf file to a Word file & added some redline/strikeout edits to your revised letter (see attached). If you agree with my suggested changes, then please make those changes & send the letter out. If you don't agree, please reply or call me.

Perhaps the 1 most important outstanding issue currently separating DEQ & EPA on this letter is whether we can currently say RPAC source control is absolutely needed. DEQ believes it's likely that source control will be required at the RPAC site, but that RPAC should 1st go thru the JSCS process to determine whether & where source control is needed. EPA apparently believes that the source control evaluation (SCE) is not needed, & RPAC should immediately begin considering source control now to support the Arkema Early Action & the possible Siltronics/Gasco Early Action. Even in light of the Early Action(s), we believe the SCE should 1st be completed. My edits to your revised letter are meant to advise RPAC that source control is very likely, but that they should 1st complete a timely SCE.

<<8\_07 EPA SC Letter to RPAC.doc>>

James M. Anderson  
DEQ Northwest Region  
Portland Harbor Section  
Phone (503) 229-6825  
Fax (503) 229-6899

-----Original Message-----

From: [\[mailto:Koch.Kristine@epamail.epa.gov\]](mailto:Koch.Kristine@epamail.epa.gov)

Sent: Friday, August 17, 2007 1:51 PM

To: ANDERSON Jim M

Cc: [humphrey.chip@epa.gov](mailto:humphrey.chip@epa.gov); [Blischke.Eric@epamail.epa.gov](mailto:Blischke.Eric@epamail.epa.gov); [MCCLINCY Matt](#); [ROICK Tom](#); [Sheldrake.Sean@epamail.epa.gov](mailto:Sheldrake.Sean@epamail.epa.gov); [cora.iori@epamail.epa.gov](mailto:cora.iori@epamail.epa.gov)

Subject: Re: RPAC Source Control Letter

Jim - Here is our revised draft letter for your review. Please let us know if you have any comments/concerns by noon Tuesday, August 21, 2007. We will not send the letter until we have heard from you. If you have any questions or would like to discuss, I am available but Chip, Eric and Sean are not. Sean will be back at noon on Tuesday.

(See attached file: Rhone Poulenc 8 2007.pdf)

Thanks,

Kristine Koch  
Remedial Project Manager  
USEPA, Office of Environmental Cleanup  
1200 Sixth Avenue, M/S ECL-115  
Seattle, WA 98101  
(206)553-6705  
(206)553-0124 (fax)  
1-800-424-4372 extension 6705 (M-F, 8-4 Pacific Time, only)

"ANDERSON Jim M"  
<ANDERSON.Jim@de  
q.state.or.us>  
08/17/2007 10:41 AM  
To  
Sean Sheldrake/R10/USEPA/US@EPA,  
Kristine Koch/R10/USEPA/US@EPA,  
Eric Blischke/R10/USEPA/US@EPA,  
Chip Humphrey/R10/USEPA/US@EPA  
cc  
"MCCLINCY Matt"  
<MCCLINCY.Matt@deq.state.or.us>,  
"ROICK Tom"  
<ROICK.Tom@deq.state.or.us>  
Subject  
RPAC Source Control Letter

Hey, everybody!

Thanks for meeting yesterday to discuss source control issues at the RPAC site. I understand EPA will revise their draft letter to RPAC based on our discussions; send it to DEQ for review; &, if we can agree on the message, send it to RPAC before our DEQ/EPA/RPAC 8/22 meeting. The purpose of this e-mail is to: 1) help you make those revisions to the letter & 2) help us reach a shared vision or position on RPAC source control in preparation for the 8/22 meeting.

Revisions to the letter

I suggest EPA's letter state that EPA is concerned with the direction & progress of RPAC source control, & your concern is heightened by the schedule demands of the Arkema Early Action. EPA concludes source control needs to occur at the RPAC property in the source area in a timely manner & that RPAC needs to comprehensively evaluate the need for additional SC quickly so it will sync with the Arkema Early Action schedule, possible additional early actions at Siltronics/Gasco, & the in-water ROD. It's critical that RPAC comprehensively evaluates the groundwater pathway for all RPAC che

micals of interest & reaches defensible conclusions regarding the need for source control. EPA expect this comprehensive source control evaluation to be submitted before the end of the year, but preferably sooner.

Shared vision or position in preparation to the 8/22 meeting Our message should be the same message as what's in the letter. We should direct RPAC to put the NFA ISCM on hold, & focus on finishing the comprehensive source control evaluation as soon as possible. We should impress upon RPAC the need to sync their source control work with Arkema Early Action, other possible early actions, & the in-water ROD. Furthermore, source control must eliminate/control the threat of recontamination & direct risk to aquatic receptors.

James M. Anderson  
Manager, Portland Harbor Section  
DEQ NWR  
Phone (503) 229-6825  
Cell (971) 563-1434  
Fax (503) 229-6899

<<Rhône Poulenc 8 2007.pdf>>